



BONJEAN
LAW GROUP, PLLC

303 Van Brunt Street, 1st Floor
Brooklyn, New York 11231

53 W Jackson Blvd, Suite 315
Chicago, Illinois 60604

Tel: 718.875.1850
Fax: 718.230.0582

www.bonjeanlaw.com

May 2, 2025

VIA ELECTRONIC FILING

Hon. Diane Gujarati
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *U.S. v. Cherwitz, et al.*, No. 23-CR-146 (DG)

Dear Judge Gujarati:

On May 2, 2025, the Court ordered, *inter alia*, that (1) the November 15, 2024, Protective Order, remove reference to Rachel Caine and Kevin Williams; (2) material possessed by Ms. Caine and/or Mr. William be clawed back, thereby granting the government's request; and (3) Ms. Caine and Mr. Williams certify destruction of the material at issue by May 2, 2025 at 4:00 p.m.

Pursuant to the November 15, 2025, Protective Order, counsel for Nicole Daedone, Mr. Williams, and Ms. Cain shared the materials contemplated by that Protective Order. Those materials were maintained in and shared through a cloud-based storage and file-sharing service. After the Court entered its Order orally on the record during the May 2, 2025, hearing, counsel for Ms. Daedone began working with Ms. Cain, Mr. Williams, and their counsel, Paul Pelletier, to remove access to the shared materials. Due to the large number of files shared, counsel for Ms. Daedone and Ms. Cain and Mr. Williams are still in the process of removing access to the files. While ownership of the cloud account has been transferred to counsel for Ms. Daedone, the cloud serviced has prompted the parties that the documents may not be accessible to either party for a couple of hours due to the large number of documents.

In light of the foregoing, Counsel for Ms. Daedone respectfully requests an extension of time until May 2, 2025 at 8:00 a.m. to complete . Undersigned counsel has communicated with the government multiple times as defense counsel was working to remove Ms. Cain and Mr. Williams for all access to the protected materials. The government has indicated that it does not oppose this request.

Respectfully submitted,

/s/ KELSEY H. KILLION

Kelsey H. Killion

One of the attorneys for Nicole Daedone

Bonjean Law Group, PLLC

303 Van Brunt Street, 1st Floor

Brooklyn, NY 11231

718-875-1850